

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT MASSACHUSETTS**

---

MARK M. THORNTON,	)	
Plaintiff	)	
V.	)	CIVIL ACTION NO. 03-12521-RGS
NORTHEAST BUILDERS TRANSPORT, INC.	)	
And BARRY N. EHRSTEIN,	)	
Defendants	)	

---

**DISCLOSURE OF MEDICAL INFORMATION IN PERSONAL INJURY CASE  
PURSUANT TO LOCAL RULE 35.1(A)**

(1) The plaintiff provides the following itemization of medical expenses:

Somerville Fire Department	\$	609.00	01/22/01
Ambulance			
93 Highland Avenue			
Somerville, Massachusetts 02143			
617-623-1700			
Massachusetts General Hospital	\$	5795.40	01/22/01
P.O. Box 9693			
Boston, Massachusetts 02114-4693			
617-726-2159			
MGM Physicians Organization, Inc.	\$	1022.22	01/22/01
ER Doctor, Radiology, EKG			
Dr. Heaps/Dr. Price/Dr. Goumas	\$	2622.00	01/29/01 -
Four Seasons Orthopedics			12/24/01
505 West Hollis Street			
Nashua, New Hampshire 03062			
603-883-0091			
So. NH Medical Center	\$	6648.00	01/29/01 -
8 Prospect Street			03/24/01
Nashua, New Hampshire 03060			
603-577-2000			
Dr. Lesser and Dr. House	\$	966.00	05/18/01
24 Dearborn Street			
Nashua, New Hampshire 03060			
603-886-0660			

Dr. Peter S. Hacker 30 Dearborn Street Nashua, New Hampshire 03060 603-883-2226	\$	599.00	02/01/01- 09/17/01
Occupational Health Center of Waltham	\$	2231.00	06/20/01 - 08/15/01
Dr. Glenn Philo, DC 76 Northeastern Boulevard #32A Nashua, New Hampshire 03062 603-889-0550	\$	1265.00	04/27/01 - 08/14/01
Nashua Anesthesia Partners 8 Prospect Street Nashua, New Hampshire 03060 603-889-2624	\$	420.00	01/29/01
Associated Radiologists 8 East Pearl Street Nashua, New Hampshire 03060 603-883-4636	\$	569.00	01/27/01- 05/24/01
Elliot Hospital One Elliot Way Manchester, New Hampshire 03103 603-669-5300	\$	1032.60	10/23/01
HealthSouth Sports Medicine 505 West Hollis Street Nashua, New Hampshire 03062 603-886-2710	\$	9847.00	02/22/01 - 02/15/02
Dr. Steven Rudman 225 Bridge Street Manchester, New Hampshire 03104 603-668-3509	\$	1381.00	10/12/01 - 07/15/02
New England Baptist Hospital 125 Parker Hill Avenue Boston, Massachusetts 02120	\$	578.00	04/25/02
Dr. James Rainville The Spine Center of NE Baptist 125 Parker Hill Avenue Boston, Massachusetts 02120	\$	2113.00	06/15/01 - 09/04/01
Joyce Santostefano, Speech Therapist Catholic Medical Center	\$	262.00	08/08/01 - 08/13/01

769 Main Street  
 Manchester, New Hampshire 03102  
 603-641-6700

Joan Scanlon, Ph.D. \$ 2120.00 05/11/01 -  
 19 Tyler Street, Suite 303  
 Nashua, New Hampshire 03060  
 603-881-7753 03/17/03

Dr. Richard W. Cullen \$ 1750.00 11/25/02 -  
 300 Chestnut Street Suite 500  
 Needham, Massachusetts 02492  
 781-444-7137 01/04/04

Dr. Marc Sadowsky \$ 595.00 09/30/03 -  
 New England Neurological Associates  
 220 Sutton Street  
 North Andover, Massachusetts 01845  
 978-687-2321 01/09/04

Michelle McClellan \$ 1716.00 10/06/03 -  
 Orthopedic Physical Therapy Associates, Inc.  
 159 Main Dunstable Road, Suite 101  
 Nashua, New Hampshire 03060  
 603-881-5554 02/10/04

Dr. David R. Kosofsky \$  
 Nashua Podiatry Associates  
 166 Kinsley Street  
 Nashua, New Hampshire 03060  
 603-880-9177

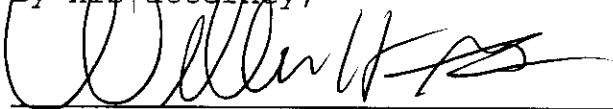
TOTAL \$ 44,141.22

The plaintiff reasonably expects to incur additional medical expenses.

(2) Pursuant to Local Rule 35.1(A)(2)(b) the plaintiff identifies the above-named health care providers at those from whom or which the plaintiff has received diagnosis, care or treatment of injuries for which recovery is sought. The plaintiff shall provide a signed statement from the plaintiff authorizing the defendant's counsel access to all the plaintiff's medical records from these and all other providers. The plaintiff's counsel states that given the recently enacted HIPAA law, each medical provider has its own particular medical authorization. The Plaintiff resides in close proximity to his counsel's office, and will return any signed medical authorization within two (2) business days of receipt of the same.

Dated: March 19, 2004

Respectfully submitted,  
MARK M. THORNTON  
By his attorney,



---

William H. Barry III  
Massachusetts BBO#545547  
Barry Law Office  
255 Main Street  
Nashua, New Hampshire 03060  
603-883-0474

C:\1118Thornton\disclosure of medical information.wpd

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has this date been forwarded to all parties the document by first-class mail, postage prepaid, as follows:

Michael B. Weinberg, Esquire  
John A. Donovan, Jr., Esquire  
Donovan Hatem LLP  
Two Seaport Lane  
Boston, Massachusetts 02210

Date: March 19, 2004



William H. Barry III